

**STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E**

IN RE:	)	<b>SOUTH CAROLINA COASTAL</b>
	)	<b>CONSERVATION LEAGUE AND</b>
Friends of the Earth and Sierra Club,	)	<b>SOUTHERN ALLIANCE FOR</b>
Complainant / Petitioner v. South Carolina	)	<b>CLEAN ENERGY'S FIRST AND</b>
Electric & Gas Company,	)	<b>CONTINUING REQUEST FOR</b>
Defendant/Respondent	)	<b>PRODUCTION OF DOCUMENTS</b>

IN RE:	)	<b>SOUTH CAROLINA COASTAL</b>
	)	<b>CONSERVATION LEAGUE AND</b>
Request of the South Carolina Office of	)	<b>SOUTHERN ALLIANCE FOR</b>
Regulatory Staff for Rate Relief to SCE&G	)	<b>CLEAN ENERGY'S FIRST AND</b>
Rates Pursuant to S.C. Code Ann. § 58-27-	)	<b>CONTINUING REQUEST FOR</b>
920	)	<b>PRODUCTION OF DOCUMENTS</b>

IN RE:	)	<b>SOUTH CAROLINA COASTAL</b>
	)	<b>CONSERVATION LEAGUE AND</b>
Joint Application and Petition of South	)	<b>SOUTHERN ALLIANCE FOR</b>
Carolina Electric & Gas Company and	)	<b>CLEAN ENERGY'S FIRST AND</b>
Dominion Energy, Incorporated for Review	)	<b>CONTINUING REQUEST FOR</b>
and Approval of a Proposed Business	)	<b>PRODUCTION OF DOCUMENTS</b>
Combination between SCANA Corporation	)	
and Dominion Energy, Incorporated, as May	)	
Be Required, and for a Prudency	)	
Determination Regarding the Abandonment	)	
of the V.C. Summer Units 2 & 3 Project and	)	
Associated Customer Benefits and Cost	)	
Recovery Plan	)	

**TO: K. CHAD BURGESS, ESQ., AND MATTHEW W. GISSENDANNER, ESQ.,  
REPRESENTATIVES FOR SOUTH CAROLINA ELECTRIC & GAS  
COMPANY:**

The South Carolina Coastal Conservation League ("CCL") and the Southern Alliance for Clean Energy ("SACE"), as intervenors and parties of record in the above-captioned actions, request, pursuant to South Carolina Public Service Commission Rule 103-833.B, that South Carolina Electric & Gas Company ("SCE&G") respond to the

following Requests for Production under oath and to serve the responses to these requests within twenty (20) days.

### **DEFINITIONS AND INSTRUCTIONS**

1. “You” and “your” includes South Carolina Electric & Gas Company and any of its representatives, owners, employees, members, attorneys, or agents.

2. If any privilege is claimed with respect to any requested item, the identification of which would otherwise be required by these requests, with respect to each document and oral communication for which a privilege is claimed, you shall:

a) identify the date thereof;

b) state the particular privilege believed applicable and concisely state sufficient facts to support the claim of privilege; and

c) if the privilege is asserted with respect to a document, identify all persons to whom its contents were disclosed, including all recipients thereof.

### **REQUESTS**

1. Please produce copies of all responses to the discovery requests submitted to SCE&G by all parties of record to Docket No. 2017-370-E. To the extent those documents have been made previously available or are otherwise available in electronic format, CCL and SACE would prefer to receive electronic access to such documents. In responding to this request, provide all responses heretofore submitted or submitted hereafter.

2. Please produce copies of all responses to the discovery requests submitted to SCE&G by all parties of record to Docket No. 2017-305-E. To the extent those documents have been made previously available or are otherwise available in electronic

format, CCL and SACE would prefer to receive electronic access to such documents. In responding to this request, provide all responses heretofore submitted or submitted hereafter.

3. Please produce copies of all responses to the discovery requests submitted to SCE&G by Friends of the Earth and Sierra Club and all other parties of record to Docket No. 2017-207-E. To the extent those documents have been made previously available or are otherwise available in electronic format, CCL and SACE would prefer to receive electronic access to such documents. In responding to this request, provide all responses heretofore submitted or submitted hereafter.

These Requests shall be deemed to continue from the time of service until the time of final disposition of this matter by the Commission so that information sought, which comes to the knowledge of a party, or its attorney, after original Responses to these Requests have been submitted, shall be promptly supplemented.

Respectfully submitted,



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*Attorneys for South Carolina Coastal  
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May 21, 2018

**STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E**

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	)	<b>CONSERVATION LEAGUE AND</b>
Friends of the Earth and Sierra Club,	)	<b>SOUTHERN ALLIANCE FOR</b>
Complainant / Petitioner v. South Carolina	)	<b>CLEAN ENERGY'S FIRST AND</b>
Electric & Gas Company,	)	<b>CONTINUING REQUEST FOR</b>
Defendant/Respondent	)	<b>PRODUCTION OF DOCUMENTS</b>

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Be Required, and for a Prudency	)	
Determination Regarding the Abandonment	)	
of the V.C. Summer Units 2 & 3 Project and	)	
Associated Customer Benefits and Cost	)	
Recovery Plan	)	

I certify that the following persons have been served with a copy of the First and Continuing Request of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy, by electronic mail, at the addresses set forth below:

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This the 21<sup>st</sup> day of May, 2018.

s/ A. Rachel Pruzin